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12 Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY INTERNATIONAL

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 FOR THE COUNTY OF MARIN

15 CHURCH OF SCIENTOLOGY)	CASE NO. 157 680
INTERNATIONAL, a California not-)	
16 for-profit religious corporation;)	PLAINTIFF'S NOTICE OF
)	MOTION AND MOTION FOR LEAVE
17 Plaintiff,)	TO COMPLETE DISCOVERY;
)	REQUEST FOR SANCTIONS FROM
18 vs.)	MICHAEL AND SOLINA WALTON
)	
19 GERALD ARMSTRONG; MICHAEL WALTON;)	[C.C.P. § 2024(e)]
THE GERALD ARMSTRONG CORPORATION,)	
20 a California for-profit)	DATE: December 16, 1994
corporation; Does 1 through 100,)	TIME: 9:00 a.m.
21 inclusive,)	DEPT: 1
)	
22 Defendants.)	
)	TRIAL DATE: May 18, 1995
_____)	

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HUB LAW OFFICES

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 16, 1994 at 9:00 a.m. in Department 1 of the above-entitled court, located at the Hall of Justice, 2501 Civic Center Drive, San Rafael, California, plaintiff CHURCH OF SCIENTOLOGY INTERNATIONAL ("the Church") will and does hereby move, pursuant to C.C.P. § 2024(e), for an order granting the Church leave to complete discovery in this action. This motion is made on the grounds that, although trial in this action was originally set for September 29, 1994, it has since been consolidated with another action, and trial has been reset for May 18, 1995. Plaintiff seeks to complete discovery concerning matters alleged in its fraudulent conveyance Complaint which concern defendants Michael and Solina Walton by having an appraiser inspect the real property which is central to this dispute, and to depose Solina Walton, a doe defendant who now claims title to the property. Defendants Michael and Solina Walton have objected to the proposed inspection, failed to object or appear for noticed deposition, and refused to meet and confer with plaintiff's counsel concerning plaintiff's reasonable request that plaintiff be permitted this additional, and necessary, discovery prior to trial, which is still more than 6 months away. Further, plaintiff has offered reasonable reciprocal right of discovery to defendant Solina Walton, with no response from Mr. Walton, her attorney. Accordingly, plaintiff brings this motion for leave to take the additional discovery, and for sanctions. This motion is based on this notice, and the

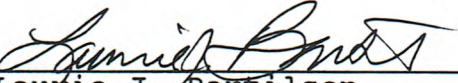
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1 accompanying memorandum of points and authorities, and the
2 declaration of Laurie J. Bartilson.

3 Dated: November 23, 1994

Respectfully submitted,

4 BOWLES & MOXON

5
6 By: 
Laurie J. Bartilson

7 Andrew H. Wilson
8 WILSON, RYAN & CAMPILONGO

9 Michael Lee Hertzberg

10 Attorneys for Plaintiff
11 CHURCH OF SCIENTOLOGY
12 INTERNATIONAL
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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On November 23, 1994, I served the foregoing document described as PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR LEAVE TO COMPLETE DISCOVERY; REQUEST FOR SANCTIONS FROM MICHAEL AND SOLINA WALTON on interested parties in this action,

[] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [] the original [X] true copies thereof in sealed envelopes addressed as follows:

FORD GREENE
HUB Law Offices
711 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

MICHAEL WALTON
700 Larkspur Landing Circle
Suite 120
Larkspur, CA 94939

MICHAEL WALTON
P.O. Box 751
San Anselmo, CA 94979

PAUL MORANTZ
P.O. Box 511
Pacific Palisades, CA 90272

[X] BY MAIL

[] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party

served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on November 23, 1994, at Los Angeles, California.

**** (BY PERSONAL SERVICE)** I delivered such envelopes by hand to the offices of the addressees.

****** Such envelopes were hand delivered by Messenger Service

Executed on _____, at Los Angeles, California.

(State) I declare under penalty of the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

 Matt Ward
Print or Type Name

 Matt Ward
Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)